

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

3 melissabaily@quinnemanuel.com

50 California Street, 22nd Floor

4 San Francisco, California 94111-4788

Telephone: (415) 875-6600

5 Facsimile: (415) 875-6700

6 Attorneys for GOOGLE LLC

7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA

9 SAN FRANCISCO DIVISION

10 GOOGLE LLC,

11 Plaintiff,

12 vs.

13 SONOS, INC.,

14 Defendants.

CASE NO. 3:20-cv-06754-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION FOR LEAVE**

1 I, Lindsay Cooper, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an partner at Quinn Emanuel Urquhart & Sullivan LLC
4 representing Google LLC (“Google”) in this matter. If called as a witness, I could and would
5 testify competently to the information contained herein.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
7 Seal portions of its Motion for Leave to File a Second Amended Complaint (“Google’s
8 Administrative Motion”). Google’s Administrative Motion seeks an order sealing the following
9 materials:

10 Document	Portions to be Filed Under Seal	Party Claiming Confidentiality
11 Google’s Motion for Leave	Yellow highlighted portions	Google & Sonos
12 Google’s SAC and redline of SAC, Exhibit 1-2 to Cooper Decl.	Yellow highlighted portions	Google & Sonos
13 Ex. 3 to Cooper Decl.	Entire document	Google & Sonos
14 Ex. 5 to Cooper Decl.	Green highlighted portions	Google & Sonos

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18 3. Portions of Google’s Second Amended Complaint (Exhibits 1 and 2) contain,
19 discuss, or refer to Google’s confidential business information, including a confidential, non-
20 public Content Integration Agreement (Ex. 3) between Google and Sonos. Similarly, portion of
21 Google’s transfer motion (Ex. 5) also discusses the Content Integration Agreement. Public
22 disclosure of this information would harm Google’s competitive standing and its ability to
23 negotiate future agreements by giving competitors access to Google’s highly confidential business
24 thinking and asymmetrical information about Google’s licensing strategies to other entities. If
25 such information were made public, I understand that Google’s competitive standing would be
26 significantly harmed.

1 I declare under penalty of perjury that to the best of my knowledge the foregoing is true
2 and correct. Executed on November 16, 2021, in Mill Valley, California.

3
4 DATED: November 16, 2021

5 By: /s/ Lindsay Cooper
6 Lindsay Cooper
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11 **ATTESTATION**

12 I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the
13 above Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Lindsay Cooper has
14 concurred in the aforementioned filing.

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16 /s/ Charles K. Verhoeven
17 Charles K. Verhoeven
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